



U.S. Department of Justice

950 Pennsylvania Avenue NW
Washington, D.C. 20530

August 28, 2024

By ECF

The Honorable Dale E. Ho
United States District Judge
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. M/Y Amadea*, No. 23-cv-9304 (DEH)

Dear Judge Ho:

We write respectfully on behalf of the Government to request the Court's leave to file the Government's letter clarifying its position regarding the location for Claimant Khudatainov's deposition under seal. The Government requests to file the letter under seal for the same reason that other recent filings regarding this subject have been made under seal. Namely, disclosing the identities of the countries under consideration may undermine efforts to obtain approval of the deposition in those countries and would also disclose sensitive information regarding the United States' relations with foreign governments. In addition, Khudatainov has expressed concerns about his safe passage to certain countries and drawing public scrutiny to his potential future travel destination may contribute to those concerns.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: /s/ Jennifer Jude
JENNIFER JUDE
DOMINIKA TARCZYNSKA
Assistant United States Attorney

MARGARET A. MOESER
Chief
Money Laundering and Asset Recovery
Section, Criminal Division
U.S. Department of Justice

By: /s/ D. Hunter Smith

JOSHUA L. SOHN

D. HUNTER SMITH

Trial Attorney

Money Laundering and Asset Recovery
Section

JENNIFER KENNEDY GELLIE

Executive Deputy Chief

Counterintelligence and Export Control

Section, National Security Division

U.S. Department of Justice

By: /s/ Yifei Zheng

YIFEI ZHENG

Trial Attorney

Counterintelligence and Export Control
Section

cc: Claimants' counsel (by ECF)